

**Certified Mail**

April 19, 2004

Mr. Shawn Ghose, EPA Project Coordinator  
Superfund AR/LA Enforcement Section (6H-EA)  
U.S. Environmental Protection Agency  
1445 Ross Avenue  
Dallas, Texas 75202

**Subject: Amended Petition to Eliminate Certain Spring Monitoring  
Arkwood, Inc. Site, Omaha, Arkansas**

Dear Mr. Ghose:

The intent of this letter is to provide additional information and clarification of our earlier petition to eliminate certain spring monitoring. The 1991 Statement of Work (SOW) identified three private wells (W-9, W-11A and W-11B) and three springs (New Cricket Spring, Cricket Creek Spring and Railroad Tunnel Spring) for monitoring (see Figure 1, attached). The SOW requested installation of a municipal water line extension to residences downgradient from the site and allowed for modification of the monitoring locations based upon the results of the dye tracing study. After the municipal water line was installed in the early 1990's, the agency authorized elimination of the monitoring of the three private wells since no pentachlorophenol (PCP) was detected in these wells and access to the inactive wells for sampling was logistically difficult. Based on the results of the dye tracing study, monitoring of the three springs identified in the SOW was required and Walnut Creek Spring was added to the monitoring schedule.

In February 2000, we petitioned, as part of our monthly report, to eliminate sampling of three area springs: Railroad Tunnel Spring, Cricket Creek (Old Cricket) Spring and Walnut Creek Spring. No concentrations of PCP had been detected at any of the springs since 1997. Per the agency's request, we conducted an additional round of monitoring of these springs in 2001 and, once again, did not detect any PCP at any of the springs. Table 1 (attached) summarizes sampling data for the three springs. A formal petition for elimination of the monitoring of the three springs was submitted on April 26, 2001.

We continue to conduct sampling of the New Cricket Spring on a monthly basis for operational and monitoring purposes. The concentration of PCP in New Cricket Spring has decreased from approximately 1,700 ppb in the 1989 to an average of about 250 ppb in 2003. The wellhead treatment system continues to operate efficiently and effectively.

I certify that the information contained in or accompanying this submission is true, accurate, and complete to the best of my knowledge, information and belief, and that I, as project coordinator, have made reasonable inquiry into its veracity.

If you have any questions regarding this amended petition, please do not hesitate to contact me at (608) 848-4134.

Sincerely,

Jean A. Mescher, Project Coordinator  
Director, Environmental Services

Enclosure

Copy:

- EPA Assistant Regional Counsel (6C-WA)\*
- Chief, Superfund Enforcement Branch (6H-E)\*
- Arkansas Superfund Site Coordinator, ADPC&E\*
- Frank Robinson, McKesson HBOC, Inc. (w/o enclosure)

**\* certified mail**

**Table 1**  
**Spring Samples 1996 – 2001**

<b>Date</b>	<b>PCP Concentrations (in µg/l)</b>		
	<b>Walnut Creek Spring</b>	<b>Cricket Creek Spring</b>	<b>Railroad Tunnel Spring</b>
<b>6/20/96</b>	<b>11</b>	<b>ND</b>	<b>111</b>
<b>10/11/96</b>	<b>IF</b>	<b>IF</b>	<b>IF</b>
<b>1/20/97</b>	<b>ND</b>	<b>ND</b>	<b>148</b>
<b>3/16/97</b>	<b>ND</b>	<b>ND</b>	<b>ND</b>
<b>7/18/97</b>	<b>ND</b>	<b>IF</b>	<b>IF</b>
<b>9/30/97</b>	<b>ND</b>	<b>ND</b>	<b>ND</b>
<b>1/2098</b>	<b>ND</b>	<b>ND</b>	<b>ND</b>
<b>5/7/98</b>	<b>ND</b>	<b>ND</b>	<b>ND</b>
<b>7/23/98</b>	<b>IF</b>	<b>IF</b>	<b>IF</b>
<b>11/4/98</b>	<b>ND</b>	<b>ND</b>	<b>ND</b>
<b>1/29/99</b>	<b>ND</b>	<b>ND</b>	<b>ND</b>
<b>7/12/99</b>	<b>ND</b>	<b>ND</b>	<b>ND</b>
<b>4/2/01</b>	<b>ND</b>	<b>ND</b>	<b>ND</b>

**ND = non-detect**

**IF = insufficient flow**